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ABSTRACT

A study determined how service policies implementing the combat exclusion provisions affect the number and assignment of military women and whether service procedures unrelated to the combat exclusion limit job opportunities for women. Based on the combat exclusion and related program needs, about 1.1 million of 2.2 million military jobs were closed to women. Not all of the remaining jobs were available to women, however, through their policies and procedures for identifying job availability and for determining or implementing accession goals for women, the services further limited the jobs for which women may compete. To allow women to compete for all jobs not closed by statutes or program needs, it was recommended that the Secretary of the Navy consider berthing area configurations when establishing the number of noncombat sea duty opportunities for women; direct the Commandant of the Marine Corps to provide open access without regard to gender to noncombat assignments now prorated between men and women; and review procedures used by officer career field managers for determining proposed accession goals for women officers. The Secretary of the Air Force should allow all unrestricted pilot and navigator openings to be available for competition by women on an equal basis with men. The Secretary of the Army should remove limits resulting from implementation of gender specific accession goals for enlisted women. (YLB)

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United States General Accounting Office

GAO

Report to Congressional Requesters

September 1988

WOMEN IN THE MILITARY

More Military Jobs Can Be Opened Under Current Statutes

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GAO

United States
General Accounting Office
Washington, D.C. 20548

National Security and
International Affairs Division

B-230552

September 7, 1988

The Honorable William Proxmire
United States Senate

The Honorable William S. Cohen
United States Senate

The Honorable Dennis DeConcini
United States Senate

This report responds to your March 24, 1987, request that we review how service policies implementing the combat exclusion provisions affect the number and assignment of women in the military, and whether other factors limit job opportunities for women. In the report we address the numerical impact of the statutory restrictions, and how service policies unrelated to statutory restrictions limit the availability of jobs for women.

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 5 days from its issue date. At that time, we will send copies to interested committees and other Members of Congress; the Secretaries of Defense, the Air Force, Army, and Navy; and the Director of the Office of Management and Budget. We will make copies available to other parties upon request.

Frank C. Conahan
Assistant Comptroller General

Executive Summary

Purpose

Because of concerns that the services might be unnecessarily limiting job opportunities for women, Senators William Proxmire, William S. Cohen, and Dennis DeConcini asked GAO to review

- how service policies implementing statutory prohibitions on combat jobs for women affect the number and assignment of military women, and
- if service procedures unrelated to the combat exclusion limit job opportunities for women.

Background

The number of women in the military services has increased from 55,400 (2.5 percent of forces) in 1973 when the All-Volunteer Force was established to 220,957 (10.2 percent of forces) in 1987. Statutes and service policies, however, restrict military jobs available to women.

Sections 6015 and 8549 of title 10 U.S.C. prohibit assigning women to aircraft and naval vessels having combat missions. Because the Women's Army Corps with its own exclusions existed in 1948 when title 10 provisions became law, title 10 includes no specific combat restriction on Army women. With the dissolution of the Corps in 1978, the Army prohibited women from jobs most likely to engage in direct combat, as a matter of policy.

To meet program needs created by the combat exclusion, the services prohibit women from filling certain noncombat jobs. Program needs include overseas/stateside rotation for the men in combat jobs in the Army and Air Force, sea/shore rotation in the Navy, and career progression opportunities for both men and women.

The services have opened new career fields and job opportunities to women. For example, the Navy opened pilot training to women in 1973 and the Air Force in 1976. More recently, Air Force women have been assigned to Minuteman firing crews and certain reconnaissance aircraft. After Secretary of Defense and Navy task forces on women in the military in 1987, the Navy opened shore based reconnaissance aircraft and 26 of its 37 combat logistics force ships which provide underway fleet replenishment. Further, the Marine Corps opened its security guard program. The services are evaluating whether closure of noncombat support units and positions is justified under a new Department of Defense (DOD) definition of "risk."

Results in Brief

Based on the combat exclusion and related program needs, about 1.1 million of 2.2 million military jobs are closed to women. All of the 1.1 million remaining jobs, however, are not available to women. Through their policies and procedures for identifying job availability and for determining or implementing accession goals for women, the services further limit the jobs that women may compete for.

GAO's Analysis

The services limit the number of jobs that women may hold beyond their identification of the requirements of the combat exclusion and related program needs. As a result, women may not compete for all jobs identified by the services as unrestricted by the combat exclusion or their program needs.

- The Marine Corps distributes some unrestricted noncombat jobs in both the Fleet Marine Force and Support Establishment equally between men and women to reflect the gender composition of the general civilian population.
- The Navy limits women to no more than one-half of the unrestricted noncombat pilot positions.
- The Air Force limits the number of new pilot and navigator openings available to women to its estimate of the proportion of women among those people interested in joining the Air Force and qualified to be Air Force pilots and navigators.
- The Army's enlisted accession goals limit the number of women recruited and the number of jobs made available to women.
- The Navy does not consider the size of berthing areas (sleeping quarters) on noncombat ships when determining sea duty availability for women. Because the size of berthing areas is a constraint when assigning mixed crews, women may not be allowed to fill the number of sea duty positions identified as open to women by the Navy methodology.

Recommendations

To allow women to compete for all jobs not closed by statutes or program needs, GAO recommends that

- the Secretary of the Navy consider berthing area configurations when establishing the number of noncombat sea duty opportunities for women;
- the Secretary of the Navy direct the Commandant of the Marine Corps to provide open access without regard to gender to noncombat assignments now prorated between men and women;

- the Secretary of the Navy review procedures used by officer career field managers for determining proposed accession goals for women officers, to eliminate unnecessary limitations on job availability;
- the Secretary of the Air Force allow all unrestricted pilot and navigator openings to be available for competition by women on an equal basis with men; and
- the Secretary of the Army remove limits resulting from the implementation of gender specific accession goals for enlisted women.

Agency Comments

DOD generally concurred with GAO's findings and recommendations. However, DOD was awaiting a special analysis by the Marine Corps to determine if any as yet unidentified program needs affect those jobs now distributed on a 50/50 basis to reflect the gender composition of the general population. If the Marine Corps cannot demonstrate a program need for this procedure, DOD agrees that those positions should be available on a gender-neutral basis.

DOD partially concurred with GAO's recommendation on Air Force pilot and navigator accessions. DOD is awaiting an Air Force study assessing the cost of attrition and retention of men and women pilots and navigators, before deciding if accession policy should be changed. GAO agrees that attrition and retention are matters of concern but notes that the number of openings for women has been so small that Air Force data may not be sufficient for effective analysis. In GAO's opinion, removal of current limits may provide an expanded database that will enable the Air Force to more effectively address attrition and retention issues.

DOD did not concur with GAO's recommendation to the Secretary of the Army. DOD stated that Army accession objectives for women are not limits but goals that the Army must exert itself to achieve. GAO did not do a market survey to identify how many women the Army could expect to enlist each year. However, officials at the Army Recruiting Command told GAO that recruiting is directed primarily toward men, and female accession goals have been met without special effort.

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Abbreviations

CLF	Combat Logistics Force
DOD	Department of Defense
FSB	Forward support battalions
GLCM	Ground Launched Cruise Missile
MSC	Military Sealift Command

Introduction

Since the inception of the All-Volunteer Force in 1973, the number of women in the U.S. military services has increased from 2.5 percent of total forces in fiscal year 1973 to 10.2 percent in fiscal year 1987. Table 1.1 shows this growth by service.

Table 1.1: Number and Percent of Women in the Services, Fiscal Years 1973 and 1987

	1973		1987	
Service	**Number of women**	**Percent of force**	**Number of women**	**Percent of force**
Air Force	19,750	2.9	75,308	12.5
Army	20,736	2.6	82,700	10.7
Navy	12,628	2.3	53,161	9.1
Marine Corps	2,288	1.2	9,788	4.9
TOTAL	**55,402**	**2.5**	**220,957**	**10.2**

Statutes Limit Opportunities for Women

Although the number of women in the services has grown dramatically, statutes and service policies restrict the kind and number of military jobs available to women. Sections 6015 and 8549 of title 10 U.S.C. prohibit the assignment of Air Force, Navy, and Marine Corps women to aircraft having combat missions. Section 6015 also prohibits Navy and Marine Corps women from serving on naval vessels having combat missions. The Women's Army Corps, in existence since 1942 and having its own exclusions, precluded the need for statutory restrictions on the Army in the 1948 act establishing the current title 10 prohibitions. With the dissolution of the Corps in 1978 and the subsequent integration of women into the mainstream of the Army, the Army prohibited women from positions that are most likely to involve direct combat, as a matter of policy.

To meet program needs created by the combat restriction, the services also close some noncombat jobs to women. Program needs include, for example, rotation between stateside and overseas assignments for Army and Air Force personnel. A majority of the combat positions in a job category may be located overseas. To prevent excessively long overseas tours, the services close some noncombat jobs in the United States. Similarly, the Navy reserves a set number of shore positions to allow for sea/shore rotation for Navy combat personnel. Further, jobs available to women are limited by some service procedures for identifying and implementing accession goals for women.

Opportunities for Women Have Expanded

After periodic reviews of their policies, the services have expanded available assignments and career fields for women while maintaining applicable statutory restrictions. For example, the Navy opened pilot training to women in 1973 and surface warfare and special operations career fields in 1978. All service academies were opened to women in 1976. The Air Force opened pilot training to women in 1976, navigator training in 1977, Minuteman crews in 1985, and some reconnaissance aircraft such as the RC-135 in 1986. In 1986, the Army opened positions in forward support battalions, and the Navy opened Military Sealift Command ships.

In the fall of 1987, in response to a report from the Chairwoman of the Defense Advisory Committee on Women in the Services, the Secretary of Defense established a Task Force on Women in the Military to address three areas of concern: attitudes toward women, combat exclusion, and career development. Concurrently with the Department of Defense (DOD) Task Force, the Navy and the Marine Corps reviewed their policies. Those reviews resulted in the standardization of the criteria used to determine when exposure to risk justifies closing noncombat jobs to women; the Navy's opening of 26 of its 37 combat logistics force ships and the land-based air reconnaissance squadrons flying the EP-3 aircraft; the Marine Corps' opening of its marine security guard program, which serves the embassies around the world; and the reevaluation of closed noncombat support units and positions with the purpose of opening those that did not meet the criteria for risk justification. Each service was also directed to improve women officer leadership development, review key billet assignment policies affecting women officers, and integrate more women into nontraditional skill areas. The services will be reporting back to the Secretary of Defense.

Objectives, Scope, and Methodology

Because of concerns that the services might be unnecessarily limiting opportunities for women, Senators William Proxmire, William S. Cohen, and Dennis DeConcini requested that we review certain issues related to job opportunities for women in the military. Specifically, the Senators asked that we determine

- how service policies implementing the combat exclusion affect the number and assignment of military women, and
- if service procedures unrelated to the combat exclusion limit job opportunities for women.

In testimony before the Subcommittee on Military Personnel and Compensation, House Committee on Armed Services, on November 19, 1987, we discussed the statutory restrictions, service policies for implementing those restrictions, and the inconsistent impact of those policies on the kinds of jobs women may hold. As agreed with congressional requesters, a copy of our statement appears as appendix I of this report. The remainder of this report addresses the numerical impact of the combat exclusion policies and limits on job opportunities caused by procedures unrelated to combat exclusion policies.

To determine how the services identify job opportunities for women, we interviewed service officials and reviewed documentation at the following locations:

- the services' headquarters, including the Coast Guard, in Washington, D.C.;
- service recruiting agencies in Washington, D.C. (Navy and Marine Corps); San Antonio, Texas (Air Force); and Chicago, Illinois (Army);
- military entrance processing stations in Detroit, Michigan; Milwaukee, Wisconsin; El Paso and San Antonio, Texas; Baltimore, Maryland; and Harrisburg, Pennsylvania; and
- U.S. Army Training and Doctrine Command at Forts Monroe, Lee, Eustis, and Belvoir, in Virginia.

The military entrance processing stations were chosen on the basis of work load volume and geographic distribution; standardized interviews were completed with representatives of the four services at each location.

Our assessment of the extent to which the services may have unnecessarily limited opportunities for women focused on those positions identified by the services as able to be filled by either men or women under existing laws and service policies. We conducted our review from March 1987 through August 1988 in accordance with generally accepted government auditing standards. The Department of Defense provided written comments on a draft of this report. These comments are presented and evaluated in chapters 2 and 3, and are included in their entirety in an appendix II.

Combat Exclusion Provisions Close Thousands of Jobs to Women

The combat exclusion statutes and service policies implementing those statutes prohibit women from serving in about 675,000 combat jobs. The services also restrict women from about 375,000 noncombat jobs to meet program needs created by the existence of combat restrictions. The needs vary among the services, but include consideration of rotation between stateside and overseas locations in the Air Force and Army, sea/shore rotation in the Navy, prevention of promotion bottlenecking for both men and women, and the availability of noncombat career-enhancing opportunities for men in combat assignments. The Army, Navy (for the enlisted ranks), and the Marine Corps use standardized methodologies to help identify the number of noncombat positions that are reserved to meet program needs created by the combat exclusion. The Air Force identified its combat and noncombat needs in 1985 through a special study. The Navy does not identify total combat and noncombat male-only requirements at officer grades. Instead, it determines job availability for women officers through its processes for setting accession goals.

We found that in addition to reserving positions to meet program needs, the Marine Corps apportions some jobs on an equal basis between men and women. This apportionment is unrelated to combat or program needs. We also found that the Navy methodology for enlisted ranks does not consider ship berthing capabilities (sleeping quarters) in determining the number of positions open to women. According to Navy requirements, a berthing area must be restricted to one gender.

Direct Impact of Combat Exclusion Provisions

By law, the Air Force, Navy, and Marine Corps cannot assign women to aircraft engaged in combat missions, and the Navy and Marine Corps cannot assign women to naval vessels having combat missions. The Air Force restricts additional positions because it interprets the intent of the combat exclusion statute to also protect women from capture. The Marine Corps identifies its direct combat requirement as enough positions to form two Marine Expeditionary Brigades in each of the three Marine Expeditionary Forces formed by the Fleet Marine Force. The Army, by policy, does not assign women to positions identified as the most likely to engage in direct combat. This policy is based on Army understanding of the intent of the exclusion laws.

Table 2.1 shows by service the number of positions the services close because of their interpretations of statutory restrictions.

Table 2.1: Total Number of Positions Closed Directly by Combat Exclusion Provisions by Service

Service	Number directly closed[a] Officer	Enlisted	Total
Air Force (FY 1988)	15,125	4,077	**19,202**
Army (FY 1987)	22,311	254,283	**276,594**
Navy (FY 1988 officers, FY 1991 projected, enlisted)	28,997	264,071	**293,068[c]**
Marine Corps (FY 1988)	()[b]	90,788	**90,788**

[a]Comparable data for the same fiscal year were not available. Where data are now estimated for future years, actual numbers may differ.

[b]Data for Marine Corps officers were not available.

[c]This total is an approximation based on data from 2 fiscal years.

Impact of Closures to Meet Program Needs

Each of the services reserves noncombat positions for men to meet program needs created by the combat exclusion as discussed below.

Air Force

The Air Force closes some noncombat positions to provide stateside rotation opportunities for men assigned to combat aircraft overseas. The number of positions was initially determined through a 1985 Air Force study. Although the number of noncombat jobs needed to provide rotation has changed since then, the Air Force maintains the same ratio of combat to noncombat positions as was established in the study. In fiscal year 1988, the Air Force reserved 504 officer and 1,452 enlisted positions to meet rotation needs. Rotation is the only program need the Air Force considers a constraint on female accessions.

Army

Officers

The Army considers several factors in determining the number of noncombat jobs needed to meet program needs. For officers, the Army determines the number of stateside jobs needed to provide rotation for men in overseas combat assignments and the number of combat casualty replacements that will be needed in the early days of a conflict. Only the higher of these two numbers is reserved since one position can fill both program needs. The Army then reviews career progression paths to ensure that the same percentage of total jobs (combat and noncombat) is

reserved for men at each higher grade to provide for promotion opportunities. In fiscal year 1987, as a result of these program considerations, the Army set aside 5,731 noncombat officer positions for men.

Enlisted

For the enlisted ranks, the Army reviews four program needs that could require restricting noncombat jobs:

1. Sufficient men in lower grades to meet combat requirements for the grade with the highest percentage of combat jobs.

2. Sufficient stateside jobs to provide rotation for men in overseas restricted positions.

3. Availability of noncombat jobs to provide career-enhancing experience for men in combat jobs.

4. Prevention of promotion bottlenecking for women by restricting the maximum percentage of women in each job category within a career field to the percentage of women allowed in the job category with the lowest percentage of women.

The impact of these program needs may apply throughout a career field or only within a particular job category—military occupational specialty. A career field is generally comprised of two or more occupational specialties, and provides the opportunity for an enlistee to progress from a trainee to the highest enlisted grade attainable, E-9. For example, the administration career field contains 16 occupational specialties, including physical activities specialist, personnel administration specialist, and legal specialist. To achieve the highest enlisted grade, a person generally needs to change occupational specialties at some point in the promotion path. For example, a physical activities specialist can remain in that job category from grades E-3 to E-7. To attain an E-8 or an E-9 promotion, that person must become an administrative specialist. A personnel administration specialist can progress only to grade E-6. To obtain further promotions, that person must become a personnel sergeant. A legal specialist, on the other hand, may remain a legal specialist and still be promoted up through grade E-9. The Army identifies the requirements of the first three program needs listed above only within each job category. The fourth is applied within a career field, not within a single job category.

The Army closes enough enlisted positions to accommodate the program need that affects the greatest number of jobs. For example, in one job category, subsistence supply specialist, at the E-2 through E-4 grades, the four program needs would require 54, 27, 59, and 0 restricted jobs, respectively, during fiscal year 1987. Only 59 were restricted. At the next grade, E-5, these same program needs would require 0, 25, 18, and 0 jobs, respectively. Only 25 were restricted. This analysis occurs at each grade in each job category to produce the total number of jobs needed to meet these program needs. Based on this analysis, in fiscal year 1987 the Army set aside 72,779 enlisted noncombat positions for men.

After closing enlisted jobs based on the four program needs, the Army, where necessary, adjusts the maximum number of jobs available to women by grade within a job category, so that the ratio from grade to grade for women is the same as the ratio from grade to grade for total requirements within that category. An Army representative told us this is done to provide equitable promotion opportunities for both men and women. In fiscal year 1987, this adjustment closed an additional 20,171 positions.

Navy

Officers

The Navy does not identify total combat and noncombat male-only requirements at officer grades. Instead, the Navy determines job availability for women officers through its processes for setting accession goals. Data on the impact of related program needs were, therefore, not available.

Enlisted

To determine job availability and accession goals for enlisted women, the Navy identifies the number of sea duty positions on noncombat ships and allots a portion of them to women based on how the Navy categorizes the job. According to Navy officials, the percentages were established on the basis of the percentages necessary to provide sufficient openings to accommodate the Secretary of Defense mandated end strength goals for Navy women—9.6 percent for fiscal year 1991—and to account for the current distribution of women among sea intensive and shore intensive jobs.

Based on these considerations, the Navy currently allots 70 percent of the noncombat sea duty jobs that the Navy considers administrative/communication skills to women, and 40 percent of boiler technician, machinist mate, and fireman jobs. For the remaining sea duty jobs, the Navy allots 50 percent to women. In addition to the number of sea duty positions available to women, the Navy adds one-half of the overseas shore assignments that are credited as sea duty. According to Navy officials, these jobs are apportioned equally between men and women to offer more rotation opportunities for men and career-enhancing opportunities for both men and women. The 50/50 distribution is intended to achieve gender equality. The result of these calculations is the number of sea duty positions that women may fill. In the long run, the Navy intends to achieve a 50/50 distribution of noncombat sea duty jobs between men and women.

The Navy also (1) makes an appropriate number of each job category's shore positions open to women, and (2) allots to women a portion of positions scheduled for such activities as training, based on the ratio of female sea and shore positions to the Navy's total force structure.

The sum of the above calculations is the upper limit on the enlisted jobs that can be held by women. Reductions in that limit are made, if necessary, to provide equitable promotion opportunities for both men and women. Under this methodology, the Navy projects that 235,892 noncombat enlisted positions will be closed to women in fiscal year 1991, as shown in table 2.2.

Table 2.2: Navy Noncombat Enlisted Positions Closed to Women
(Projected Fiscal Year 1991)

1. Male shore rotation for combat sea duty	118,293
2. Noncombat sea duty not programmed for women	18,401
3. Shore duty for noncombat sea duty closed	7,841
4. One-half overseas shore duty positions credited as sea duty and stateside shore duty for those positions	8,242
5. Training, etc., billets reserved for men	77,577
6. Reduction of female upper limit to provide equitable career progression for men and women	5,538
Total	**235,892**

The enlisted Navy methodology does not take into consideration berthing area configurations of the ships involved. The size of the berthing areas (sleeping area), however, is a constraint on assigning women to sea duty positions. There is no minimum male requirement on ships open to women because these ships do not have a combat mission.

Because of Navy habitability and sanitation facilities requirements for crew members, however, the gender composition of crews on these ships, particularly in the enlisted grades, must coincide with the various male/female combinations that can be accommodated by the sizes of the ships' berthing areas. If a ship has four enlisted berthing areas, for example, each with a capacity for 40 people, then women and men must be assigned in increments of 40, such as 40/120 or 80/80.

Under the Navy's approach for identifying job availability for women, the Navy will be increasing (1) the number of women in sea intensive job categories, (2) the number of noncombat sea duty positions filled by women, and (3) the percentage of women in mixed crews. The Navy is making these increases to accommodate the Secretary of Defense's mandated increase in the Navy's female end strength while providing both men and women in the same job category with the same sea/shore rotation ratio. The Navy can accommodate the increases because of the increased number of sea duty jobs for women resulting from the Navy's December 1987 decision to open 26 of its combat logistics force ships. However, because the Navy methodology does not correlate the number of unrestricted sea duty positions targeted for women with the size of ships' berthing areas, it is not certain that the ships will be able to house the designated number of women. As a result, the Navy may not be able to assign women to all the sea duty positions that are theoretically open to them.

Marine Corps

The Marine Corps considers the following when reserving noncombat positions for men. The Marine Corps

- reserves enlisted and officer noncombat positions equivalent to 25 percent of the total combat requirement (excluding aviation combat units) as casualty replacements for combat arms positions;[1]
- closes some noncombat officer positions that require combat arms experience to perform assigned duties;
- distributes positions in some job categories equally based on the split of men and women in the general population; and
- maintains the same percentage of men and women in job categories that offer or require rotation between the Fleet Marine Force and the Support Establishment to provide equitable rotation opportunity.

[1]The Marine Corps maximizes the positions open to women in this step by not counting fractional positions as closed to women. This results in 439 open positions that would otherwise be closed.

The objective of the methodology is to calculate the minimum number of male-only positions related to combat needs, and, therefore, the maximum number of positions available to women. Based on this process, a total of 28,342 noncombat enlisted positions were closed to women in fiscal year 1988. Data for officers were not available.

These procedures establish the number of positions open to women by job category and grade. In the enlisted and unrestricted officer grades, that number is then adjusted to provide career progression opportunities for both men and women by establishing the same proportions of men and women at each grade level.

To determine the adjustment needed for career progression, the Marine Corps first calculates the proportion of total jobs open to women in each grade within a job category. The proportion of women allowed in each grade of a job category is then reduced or increased to equal the percentage of jobs in the grade with the second lowest proportion. The second lowest rather than the lowest proportion is used to minimize the limitation resulting from this process. For example, if women comprised 45, 35, 25, and 15 percent of personnel in grades E-2 to E-4, E-5 to E-7, E-8, and E-9, respectively, within a job category, then the number of women allowed in each grade would be changed to 25 percent throughout the job category.

However, since the grade that previously was the lowest will be increased, the Marine Corps limits openings for women to no more than 1.5 times the total number of female openings available in the job category before this adjustment. This adjustment for career progression needs closed an additional 3,130 enlisted positions in fiscal year 1988, leaving a total of 9,873 enlisted positions open to women. Data on officers were not available.

Conclusions

In addition to closing combat jobs as required by law, the services close noncombat jobs to meet program needs created by the combat restrictions. This indirect impact of the combat exclusion provisions stems from service efforts to address the resulting resource management and equity problems affecting men and women in terms of assignment type, location, and career progression opportunities. Overall, about 1.1 million of 2.2 million military positions are closed to women. Of the remaining 1.1 million positions, women fill about 220,000. The positions closed because of statutory and program needs impacts are summarized in table 2.3.

Table 2.3: Summary of Positions Closed to Women Because of Statutes and Program Needs

Service[a]	Statutory impact	Program needs	Total
Air Force	19,202	1,956	**21,158**
Army	276,594	98,681	**375,275**
Navy	293,068	235,892[b]	**528,960[c]**
Marine Corps	90,788[b]	31,472[b]	**122,260[c]**

[a]Comparable data for the same fiscal year were not available.

[b]Enlisted only. Data for officers were not available.

[c]Total understated because of the lack of data on officers.

We did not assess the validity of service calculations to identify the number of jobs that must be reserved for men to meet combat and related program requirements. In the Marine Corps methodology, however, some opportunities are equally divided between men and women to reflect the male/female composition of the general population. This distribution is not required by the combat exclusion laws or any related program needs. We recognize that this provision affects only about 375 positions, but unless the Marine Corps can show a program need for this distribution, we believe these jobs should be available on a gender-neutral, open-access basis.

We also believe that the Navy needs to consider the configuration of berthing areas when determining sea duty availability for women, rather than determining availability solely on the basis of whatever combination of job category inventories is needed to meet mandated inventory goals. The size of the berthing areas will act as a constraint on the assignment of women once they have entered the service.

Recommendations

We recommend that the Secretary of the Navy

- direct the Commandant of the Marine Corps to provide open access on a gender-neutral basis to noncombat assignments now equally divided between men and women to reflect the gender composition of the general population and
- consider berthing area configurations when establishing the male/female distribution of noncombat sea duty positions.

Agency Comments

DOD concurred with our findings and recommendations. DOD stated it was awaiting a special Marine Corps study to determine if any as yet unidentified program needs affect unrestricted positions now distributed equally between men and women to reflect the gender composition of the general population. DOD agreed that if the Marine Corps cannot demonstrate a program need for the 50/50 rule, then those positions should be made available on a gender-neutral, open-access basis.

DOD noted that the Navy has already taken action on berthing area capacities to enable it to assign women to 50 percent of the positions on noncombat ships. The Navy is currently reviewing a preliminary ship alteration plan, completed by the Naval Sea Systems Command on June 16, 1988, that identifies changes needed to provide sufficient berthing area capacities for women.

DOD stated that it did not concur with an implication that female officer accession goals were solely driven by positions on noncombat ships. This is an incorrect reading of our discussion of procedures related to enlisted personnel only, and we have clarified our discussion of officer and enlisted procedures for identifying program needs to avoid misunderstanding.

Service Accession Goals Limit Job Availability for Women

The positions remaining after the services have set aside enough jobs to meet combat and program needs can be filled by either men or women. We found, however, that some service procedures for identifying and implementing accession goals limit the number of unrestricted noncombat jobs made available to women. These limits are not required by either combat exclusion or related program needs, and therefore, unnecessarily restrict the number of jobs that women may compete for under current statutory provisions. Such limits occur in the Air Force at both officer and enlisted grades, in the Army at enlisted grades, and in the Navy at officer grades.

We did not do a market survey to identify how many women might enter the services if unnecessary limits were removed. We recognize that open access to all unrestricted positions on a gender-neutral basis would remove guaranteed minimums for men and women. Removal of unnecessary limits would expand job opportunities which both men and women could compete for.

Air Force

Officers

The Air Force restricts entry to only two officer career fields because of the combat exclusion provisions—pilot and navigator. Combat and related program requirements for other career fields have not been sufficient to warrant restrictions. We found that after restricting enough pilot and navigator positions to meet combat mission requirements, the Air Force makes available to women a small percentage of these unrestricted noncombat openings, based on its estimate of the proportion of women in the general population who are interested in joining the Air Force and qualified to be pilots and navigators. That estimate (8.4 percent discussed below) is determined by multiplying the male/female ratio of (1) the general population by (2) the youth interested in joining the Air Force based on a survey of youths' interest, and educational, testing, and physical standards requirements for becoming pilots and navigators.

In 1986, the Air Force established a goal of producing 2,000 new pilots and 800 new navigators each year. Of these, 40 pilots and 10 navigators could be women. The Air Force derived these numbers by multiplying the number of noncombat positions (24 percent for pilots and 14 percent

for navigators) by the qualified and interested rate for women (8.4 percent) for these fields. Allowing for attrition during training, 60 women could enter pilot training and 14 women could enter navigator training annually. Figures 3.1 and 3.2 show the impact of this process using the 2,000 pilot and 800 navigator positions from the original needs assessment.

Figure 3.1: Annual Number Estimated to Complete Pilot Training

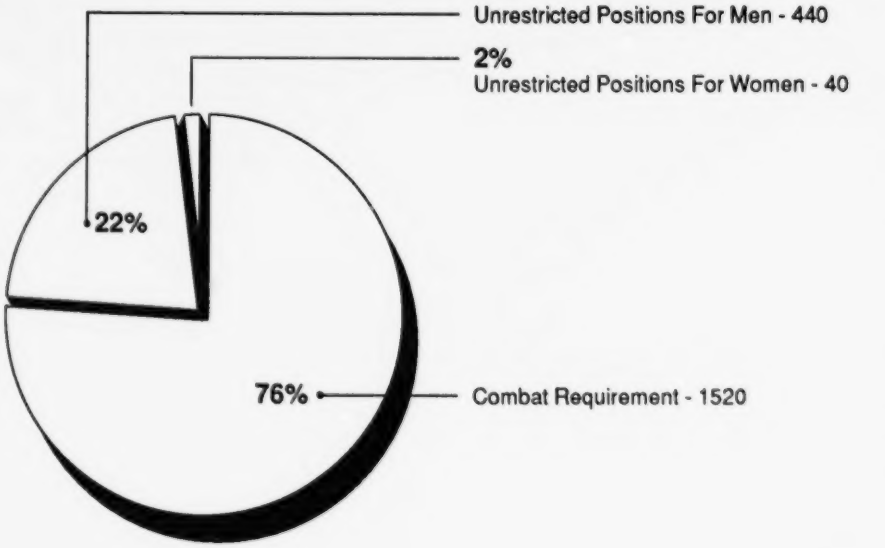
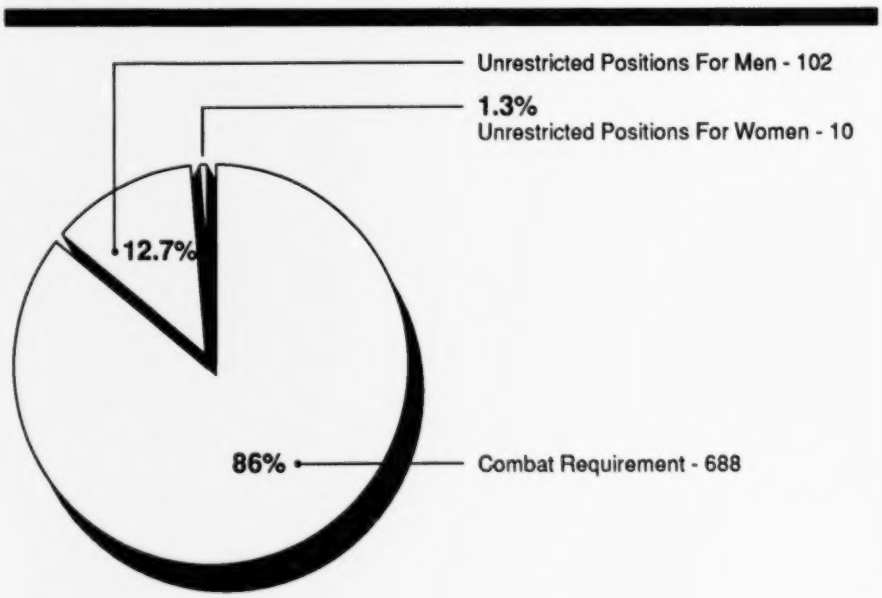


Figure 3.2: Annual Number Estimated to Complete Navigator Training



Because of recent officer reductions, the Air Force has reduced its annual goals for new pilots and navigators. In fiscal year 1987, the Air Force goals were 1,700 pilots and 685 navigators. The goals and training openings for women, however, were held constant because the initial numbers were so low.

Enlisted

The Air Force has controlled the number and kinds of jobs made available to women applicants and as a result has limited female accessions. The number of jobs available has been based on the Air Force estimate of the ratio of women among those persons in the general population qualified and interested in those jobs in the Air Force. In fiscal year 1987, the overall percentage estimate of the ratio of women among the qualified and interested pool ranged from 15 to 19 percent. In fiscal year 1988, the range increased to 18 to 22 percent.

Prior to 1986 the Air Force set a maximum for enlisted female accessions. To enforce that maximum, the Air Force used separate computer-accessed job listings for male and female applicants. In 1985, the House Committee on Armed Services directed the Air Force to review its enlisted accession system. As a result, in January 1986, the Air Force modified the system to allow the transfer of jobs from one listing to

another to be more responsive to demand. According to Air Force officials, the dual system was retained to meet anticipated minimum quotas for women required by the Committee. Officials said implementation of a single, gender-free job listing would take a maximum of 18 months (or a total of 6,000 programming hours) to implement and would be costly and time-consuming to reverse if quotas were imposed.

In February 1988, we briefed staff of the House Committee on Armed Services on the operation of the modified dual job list system. As a result, the Committee removed the minimum quotas and directed the Air Force, in the National Defense Authorization Bill for 1989, to develop and implement a gender-neutral system for enlisted accessions. That system is to be in use by October 1, 1989.

Army

Enlisted Accession Goals

The Army's implementation of annually established accession goals for nonprior service enlisted women (enlistees without prior Army service) limits job opportunities for women far below the 231,000 jobs remaining unrestricted after applying the combat exclusion and after accounting for program needs. In fiscal year 1987, about 70,000 enlisted women were in the Army. According to an Army official, accession goals are based on a consideration of how many women the Army believes it can enlist on a regular basis, and on an Army objective of reaching a female enlisted end strength of 74,000. Therefore, accession goals for women govern the number of women who are recruited and the number of jobs made available to women applicants.

Accession goals are implemented by the Army Recruiting Command as a maximum for men and women. The recruiting command receives gender-specific goals for nonprior service enlistees each year from the Army Deputy Chief of Staff for Personnel. The command then establishes separate male and female goals at each operational level down to the individual recruiter. Recruiting agency officials told us that recruiters are not allowed to make gender substitutions in their assigned goals.

The Army uses separate male and female job listings when recruiting. The number of jobs for women is based on female accession goals and cannot be increased unless the Army increases these goals. Each

increase also requires a corresponding decrease in the accession goals for nonprior service men because accession goals are governed by total authorized end strength.

Navy

Officers

The Navy determines job availability for women officers through its procedures for setting accession goals for each career field.[1] Officer career field managers prepare initial accession goal estimates that may be adjusted by Navy planners. Although the 10 career field managers we met with used some similar concepts in arriving at proposed accession goals, a unique process was used for each career field. Navy officials told us that processes differed because each career field has its own career path requirements.

In the absence of good documentation on either the criteria used by the career field managers to determine proposed female officer accession goals or implementation of the criteria, the impact was not always clear. We did determine, however, that the separate processes do not generally assess total combat and related program needs for the entire career field. Further, the results of the Navy's 1987 special study group on women and reviews related to specific officer career fields have brought about some changes in job opportunities available to women that can affect the processes and/or data used to establish female accessions.

We found that the procedures used by the officer career field managers placed unnecessary limits on the number of jobs made available to women in three career fields—pilots, surface warfare, and special operations—before the 1987 special task force completed its work. Further, in one field, pilots, changes in job opportunities for women, resulting

[1]Unlike the other services that have a standardized methodology for determining job availability for women, the Navy determines job availability for its women officers through its procedures for setting accession goals. These procedures differ for each Navy officer career field. We reviewed procedures used by 10 of the 17 Navy officer career field managers who establish proposed female accession goals. We did not look at the career fields of two managers because combat restrictions precluded assignment of women to one, and assignment of women to the other was open only at the commander level or above. Of the remaining 15 managers, we reviewed the processes used by the 6 responsible for career fields with more than 3,000 officers in fiscal year 1986, 3 of the 6 responsible for career fields with 1,000 to 3,000 officers, and 1 of the 3 responsible for career fields with less than 1,000 officers. The career fields reviewed totaled 62,704 officers, or 87 percent of the Navy's fiscal year 1986 total of 72,051.

from task force recommendations, were not incorporated by the officer career field manager into the formulation of annual accession goals.

In the pilot career field, female accessions for trainee positions are based on the number of available initial assignment openings—about 1,000 pilots are needed each year. We were told that accession goals for women are arbitrarily limited to one-half of the 62 unrestricted noncombat openings. Although the Navy subsequently opened the EP-3 aircraft to women as a result of the work of the special task force, the Navy has not increased the number of unrestricted noncombat pilot positions made available to women. According to a Navy official, the Navy will continue to limit women to no more than 31 of the unrestricted noncombat openings and will provide pilots for the EP-3 aircraft by replacing some women in training positions with men.

In the surface warfare career field, female accessions had been based on the availability of only one commander position (0-5), although 6 captain (0-6) positions were open and adequate junior grade sea duty positions were available to support more than the one commander (0-5) position. The availability of only one commander position limited female accessions to 17 per year. The special task force review resulted in the opening of 26 of the Navy's 37 combat logistics force ships, thereby making available up to 9 unrestricted commander (0-5) positions. The Navy has incorporated this change into its determination of accession goals. Using the male rate for grade progression to commander, annual female accessions were increased from 17 in fiscal year 1987, to a projected 50 in fiscal year 1990.

Navy officials said female accessions in special operations were constrained by the limited availability of appropriate shipboard facilities for women officers below the command level. The Navy placement officer had designated only 8 of a possible 20 ships as suitable for women. Officials told us that private facilities are more difficult to provide on small ships and these positions tend to be on small ships. A Navy review of the remaining 12 ships resulted in 9 more being designated as suitable for assigning women.

Conclusions

As discussed in chapter 2, the combat exclusion laws and service policies and procedures for implementing those laws, including resource management and equity considerations, limit the number of jobs women can fill. In addition, some service procedures for identifying and implementing accession goals further limit the number of women who can join

the military. Unless the services have compelling reasons that they have not yet identified, all unrestricted jobs should be available to men and women on an equitable basis. Opening all unrestricted jobs for equal competition would remove the current limits on the number of women in unrestricted noncombat positions. Neither gender would then be guaranteed a minimum percentage of the available jobs.

Air Force

The Air Force limits the number of unrestricted pilot and navigator positions that can be held by women based on its estimate of the percentage of women in the qualified and interested pool. In our opinion, the Air Force policy of limiting the number of jobs made available to women to this estimate is unnecessarily restrictive. For example, of 480 unrestricted pilot positions, only 40 may be filled by women under current Air Force policy.

Army

Army accession goals for nonprior service enlisted women and men have been implemented as a maximum. Based on Army accession goals, the Army Recruiting Command establishes separate male and female goals at each operational level down to the individual recruiter. Recruiters are not allowed to make gender substitutions. Further, the Army uses separate male and female job listings when recruiting. The number of jobs on either list is the maximum made available to men or women unless Army-wide accession goals are adjusted. We believe the number of unrestricted noncombat jobs and the available supply of interested and qualified women should govern the maximum number of enlisted women rather than annual accession goals specifically for women. Reprogramming the Army enlisted job system to reflect "male only" and "unrestricted" positions could provide the mechanism for implementing a gender-neutral accession system for unrestricted positions. The system could allow male applicants to access both job lists and female applicants to access only the "unrestricted" job list.

Navy

The procedures used by officer career field managers to determine proposed female accession goals for Navy officer career fields do not generally assess total combat and related program needs. The impact of the various processes on job opportunities for women, therefore, was not always clear. In three career fields, opportunities for women appeared to be unnecessarily limited prior to changes in job availability resulting from the work of the task force on women and an internal Navy review. Although increased job availability brought about by resulting changes

was incorporated into formulation of accession goals for two of those career fields, it was not incorporated into determining female pilot accessions. We believe the Navy should review the procedures used by officer career field managers to determine job availability for women officers, to ensure that unnecessary limitations do not exist and that changes in job availability have been incorporated into their procedures.

Recommendations

To enable the services to obtain the most capable people overall, and to gain the maximum benefit possible from available resources, we recommend that

- the Secretary of the Air Force allow all unrestricted pilot and navigator openings to be available for competition based on individual qualifications without regard to gender,
- the Secretary of the Army remove limits resulting from the implementation of accession goals for women enlistees, and
- the Secretary of the Navy review procedures used by officer career field managers for determining proposed female accession goals for women officers to eliminate unnecessary restrictions on job availability which may result from those procedures.

Agency Comments and Our Evaluation

Air Force

DOD partially concurred with our finding and recommendation on Air Force pilot and navigator accessions. DOD believes that implementation of a gender-neutral pilot training entry program would be premature until additional research on attrition and continuation rates can demonstrate that expanding opportunities for women would permit the meeting of qualified air crew requirements at an affordable cost. DOD noted that pilot training attrition is 34 percent for women compared to 26 percent for men, and that the current 6-11 year voluntary continuation rates for women pilots and navigators are at least 20 percent lower than the rates for men flying similar aircraft. DOD added that in view of current and projected pilot shortfalls and the very high cost of training pilots, the relative cost-effectiveness of expanding women entrants will

be dependent upon the development of a flight training selection methodology that can predict successful pilot training completion equally well for men and women.

We agree that the Air Force should be concerned with attrition and retention rates. However, the 60 positions ascribed to women each year is so small that a few women can have a major impact on female attrition and retention rates. For example, only 5 additional women in any year would have to complete pilot training to reduce the female attrition rate from 34 to 26 percent. Removing limits could provide the Air Force with a larger database for more effectively and equitably evaluating attrition and retention.

DOD also stated that current Air Force methodology provides opportunity in flying careers open to both men and women in proportion to the interested and qualified population of the entry cohort. We disagree with the Air Force's use of a proportional distribution of noncombat pilot and navigator positions based on estimates of the interested and qualified population. Application of this process limits job availability beyond the requirements of the law or identified program needs.

Army

DOD agreed with our description of the Army's accession procedures but did not concur with our recommendation. DOD stated that the Army's accession goals for women were not limits that restrict women entrants, but were goals that the Army must exert itself to achieve. DOD stated that if the female accession floor were removed and the recruiting force allowed to recruit on a gender-neutral basis, a significant reduction in female accessions would occur. Further, DOD noted that while accession goals limit the number of both men and women who may enlist in a given year, they do not restrict the number who may enlist in the delayed entry program.[2]

One objective of our review was to determine if service policies or procedures unrelated to the combat exclusion provisions limit job opportunities for women. DOD stated that accession goals through fiscal year 1994 would bring women up to 74,000, an increase of about 3,000 over current numbers. Even though 40 percent of Army enlisted positions are unrestricted, only about one-third of those are held by women. We are

[2]Enlistees may commit to enter the Army as far in advance as 12 months through registration in the delayed entry program.

not suggesting that the number of women be controlled so as to artificially increase their portion of Army accessions or end strength. We recognize that removal of limits means that neither men nor women would be guaranteed a minimum number of available unrestricted jobs. We did not do a market survey to identify the number of women the Army might expect to access each year. However, it is difficult to understand how female accessions would decrease significantly in an all-volunteer environment since officials at the U.S. Army Recruiting Command stated that the Army directed its recruiting efforts primarily toward men and was able to meet its female accession goals without any special effort.

We believe that precluding women from competing for all unrestricted positions imposes unnecessary limits on job availability. The fact that the actual number of women enlistees may not exceed the limit does not negate its existence. Nor do changes in accession goals change the existence of the limit as long as those goals prevent women from competing for all available unrestricted jobs.

The ability to enroll in the delayed entry program for the following fiscal year also does not negate the limitation. Once women reach the number of jobs available to them in a given fiscal year they must resort to the delayed entry program for the following fiscal year. According to data from the Army Recruiting Command, the longer a person is listed in the delayed entry program before actual entry on active duty, the less likely that person is to enlist.

Navy

DOD concurred with our findings and recommendation regarding Navy officers. DOD noted, however, that the Navy conducts various annual reviews of procedures for determining accession goals for women officers to ensure increasing participation in all aspects of the Navy. DOD noted that the Navy has a study in progress to determine the correct number of women officers that can be supported by the newly authorized aviation career patterns, and that the Navy intends to increase the number of women pilots above the level stated in this report as soon as the study is complete.

We recognize that the determination of final accession goals is based on various levels of review by the Navy, and that the Navy is and has been examining several questions regarding the assignment of women. Our findings and recommendation, however, are directed specifically at the procedures used by officer career field managers to establish initial

accession goal estimates. We have clarified the report text and recommendation to indicate that.

GAO Testimony on Combat Exclusion Laws for Women in the Military

The following testimony, "Combat Exclusion Laws For Women In the Military," was given by Martin M Ferber, Senior Associate Director, National Security and International Affairs Division, on November 19, 1987, before the Subcommittee on Military Personnel and Compensation, Committee on Armed Services, House of Representatives.

Madam Chairwoman and Members of the Subcommittee:

We are pleased to be here today to discuss the military services' interpretation and application of the combat exclusion laws for women in the military. As you know, we are reviewing this and other women in the military issues for Senators William Proxmire and William Cohen.

Since the inception of the All-Volunteer Force in 1973, women have become a significant and integral part of our military services. In 1986, they constituted 10.1 percent of our overall forces, up from 2.5 percent in 1973, and the kinds of jobs held by women have continued to expand. Statutory restrictions, however, limit the jobs available to women and, as a result, the number of women in the military.

My testimony today provides background on the statutory restrictions which were enacted almost 40 years ago, and the services' policies for implementing those restrictions. While the services are making a concerted effort to apply the restrictions accurately in the changed warfare environment, their applications have resulted in questions concerning the impact of the restrictions on military women's career progression and the military jobs they can hold.

Legislative History and Current Statutory Provisions

In 1948 Congress acknowledged the quality and value of the contribution women made in World War II and passed the Women's Armed Services Integration Act of 1948. That act institutionalized the role of women in the services by establishing career opportunities for them in the regular active duty components as well as the reserve forces. The act, however, also restricted (1) the total number of women in the services, (2) the kinds of jobs they could hold, and (3) the military rank they could achieve.

- The total number of women in the Air Force and Army, and the total number of enlisted women in the Navy could not exceed 2 percent of total authorized strengths. Women Navy officers could not exceed 10 percent of the total female enlisted strength in the Navy.

- Air Force, Navy, and Marine Corps women could not be assigned to aircraft which were engaged in combat missions, and Navy and Marine Corps women could not serve aboard any Navy vessel except hospital ships and navy transports. (Existence of the Women's Army Corps with its own exclusions precluded the need for separate statutory combat exclusions for Army women.)
- With the exception of the medical field, women could not serve in command positions or hold a permanent grade above lieutenant colonel or Navy commander.

In 1948, some in the Congress believed combat required physical strength that women did not possess. In addition, women's role in society was such that a policy of having women in combat was almost unthinkable.

The weapons of war and battle strategies have changed dramatically since 1948. Military equipment and weapons now require technological skills as much, if not more so, than physical strength. Also, the capability to deliver weapons from remote locations increases the vulnerability of civilians and military alike. Modern technology and the strategies and tactics it enables, blur the boundaries of the "battlefield."

In addition to these changes in the conduct of warfare, the role of women in society has undergone dramatic changes, particularly since the 1960s. Today, women pursue careers in fields that were largely closed to them 40 years ago.

As a result, the services are faced with the dilemma of applying a 40-year-old statute in the context of modern warfare and the changing role of women in American society.

There have been two amendments to the 1948 act which affect the numbers of women in the military services and the kinds of jobs they can hold. In 1967, the statutory strengths and grade limitations were lifted. In October 1978, a substantive change was made in the types of jobs women could hold. Restrictions on Navy and Marine Corps women were reduced to allow them to fill permanent assignments on noncombat ships such as tenders, repair ships, and salvage and rescue ships. It was this change that enabled women to serve on the USS ACADIA, a destroyer tender, which provided repair and logistics support to the USS STARK in the Persian Gulf this spring. Of the 1,336 crew members, 240

were women. The 1978 statutory change also allowed women to fill temporary assignments for up to 6 months on any ship that was not expected to have a combat mission during that time.

Current Service Interpretation and Application of the Statutes

The services have identified the kinds of assignments that are available to women based on their understanding and interpretation of the statutes.

Air Force

The statutory exclusion for the Air Force, as provided for by the 1948 act, is included in title 10 United States Code, section 8549. Under that law, women cannot be assigned to aircraft engaged in combat missions. The Air Force has defined combat mission aircraft as those whose principal mission is to deliver munitions or other destructive materials against an enemy. On this basis, women cannot be assigned to Air Force fighter and bomber aircraft.

Air Force officials told us that the Air Force believes the restriction against flying combat mission aircraft is intended to provide women some degree of protection. Therefore, the Air Force also excludes women from aerial activity over hostile territory where they would be exposed to both hostile fire and a substantial risk of capture. Women are also excluded from certain duties, such as combat control, tactical air command and control, aerial gunner, and pararescue and recovery, and certain units, such as tactical air control parties and air support radar teams, where there is also a high probability of exposure to hostile fire and substantial risk of capture.

This interpretation has evolved over time. Prior to 1985, exposure to either hostile fire or substantial risk of capture alone could have excluded women from some jobs. However, an Air Force review of (1) its policy and the legislative history of the combat exclusion statute, and (2) how that related to the conduct of modern warfare, resulted in the combined use of the hostile fire and risk of capture tests. Under this policy revision, the Air Force, in December 1986, opened up to women the RC-135 reconnaissance aircraft, and two EC-130 electronic warfare aircraft missions, on the basis that, while the crews might be subject to enemy fire, they would not also be subject to a substantial risk of capture. However, it is this same criteria which excludes women from

reconnaissance aircraft over hostile areas—they would be subject to capture if shot down.

Navy/Marine Corps

The statutory exclusion for the Navy, as provided for in the 1948 act, is contained in title 10 United States Code, section 6015. Under that law, Navy and Marine Corps women cannot be assigned to aircraft or naval vessels engaged in combat missions. The Navy defines combat mission as seeking out, reconnoitering or engaging the enemy. This precludes assignment of women to such ships as aircraft carriers, destroyers, and submarines. The Navy also excludes jobs on ships which travel with the combatant group even though, in and of themselves, they would not have a combat mission under the Navy definition. Thus, jobs on Mobile Logistics Force Ships, which were renamed in November 1986 to Combat Logistics Force (CLF) ships, are closed to women on the basis that they travel with the combatant group. The Navy justifies this decision by reference to a 1978 Defense Department definition of combat missions where "task organizations" were included as units that could have combat missions.

The statute that applies to the Navy also applies to women in the Marine Corps. Marine Corps women cannot be assigned to combat ships or aircraft. Further, a Marine Corps official told us that it is Marine Corps policy to transport Marines on combat ships in wartime. Therefore, Marine Corps women assigned to units that will deploy on those ships cannot deploy with their units unless other transportation is available.

With the Marine Corps, the level of physical risk is also a factor. As a result, women can pursue 33 of the 37 Marine occupational fields; the 4 that are closed are infantry, artillery, tanks/amphibious vehicles, and naval aviator/flight officer. Further, the Marine Corps' combat exclusion rules prohibit women from being assigned to units with the greatest physical risk, such as infantry regiments. Women, therefore, may not be assigned to any unit that is likely to become engaged in direct combat, which the Marine Corps defines as seeking out, reconnoitering, or engaging hostile forces in offensive action. Women may, however, be assigned to combat support and combat service support units in a designated hostile fire area where they could become involved in defensive combat action resulting from an enemy attack.

Army

There are no statutory combat restrictions for Army women. The Women's Army Corps, in existence as a separate unit since 1942, had its

own exclusions. With the dissolution of the Corps in 1978 and the subsequent integration of women into the mainstream of the Army, the Army developed its own combat exclusion policy based on its interpretation of congressional intent as reflected in the statutes affecting the other services.

Army policy is intended to open to women all jobs except those having the highest probability of engaging in direct combat. The policy recognizes that the modern battlefield is fluid and lethal and that all soldiers, male and female, will be exposed to the threat of injury or death throughout the theater of operations. There is no intent to remove women from jobs that would expose them to the threat of injury or death because the Army recognizes that soldiering is inherently dangerous.

Army policy is governed by the Direct Combat Probability Coding system, introduced in 1983, which ascribes to each Army job an assessment of the probability of that job participating in direct combat. The Army defines direct combat as engaging an enemy with individual or crew-served weapons while being exposed to direct enemy fire, a high probability of direct physical contact with the enemy, and a substantial risk of capture. Direct combat occurs while closing with the enemy in order to destroy or capture, or while repelling assault by fire, close combat, or counterattack. The policy was derived from an analysis of four criteria: the duties of the job specialty, the unit's mission, tactical doctrine, and location on the battlefield. Jobs are assigned a code, P1 through P7. P1 represents the highest probability of engaging in direct combat and P7 the lowest. Women cannot be assigned to P1 jobs.

Army officials told us that battlefield location has the greatest impact on the "P" rating of a position. Jobs in areas located forward of the brigade's rear boundary are generally rated P1 and therefore closed to women. However, with the exception of the battalion's infantry and tank system support teams, women may fill jobs in forward support battalions (FSB) which provide combat service support forward of the brigade's rear boundary.

Formation of the FSB resulted from a reorganization of support services as part of the Army's transition to the Army of Excellence. Previously, separate medical, maintenance and supply and transportation battalions, were located outside, or behind, the brigade's rear boundary. Under Army "P" rating criteria women were assigned to those units.

The reorganization transferred those services to one main support battalion still located outside the brigade and three FSB's now located forward of the brigade's rear boundary. Each FSB provides all three types of support functions.

The initial effect of the location change was the coding of all FSB positions as P1, closing jobs which women had formerly held. After a review of this effect, which the Army called unintentional, and with strong support from field commanders, the Army opened the FSB's to women, except for the infantry and tank system support teams which worked closely and continuously with the maneuver battalions and would therefore be highly likely to engage routinely in direct combat. In addition, women may serve in other jobs which require them to periodically transit the maneuver brigade rear boundary and there is no limit on how far forward a woman may travel during a temporary excursion.

Coast Guard

There are no statutory restrictions on the kinds of jobs Coast Guard women may hold. They can be assigned to any kind of duty on any kind of Coast Guard vessel. During peacetime, the Coast Guard falls under the jurisdiction of the Department of Transportation, but in wartime it is transferred to the Secretary of the Navy. However, according to a Navy Judge Advocate General opinion, the statutory restrictions on Navy women will not apply to Coast Guard women. The Secretary of the Navy, however, has the authority to decide whether or not to apply those same or similar restrictions.

Application of Exclusion Provisions

Given the complexity and fluidity of modern warfare and the considerably changed social role of women, it is difficult to draw clearcut lines which identify safe versus dangerous locations, military jobs women can or cannot do, or military jobs women should not do. By restricting certain assignments without specifying an objective or, in lieu thereof, the parameters of what constitutes a "combat mission," the statutes leave to the services the responsibility for determining the coverage of the exclusion. While the services are trying to apply the statutes accurately, the language of the statutes permits different interpretations in the context of modern warfare. The common theme in the application of the combat exclusion provisions seems to be an effort to preclude women from the most frequent or severe exposure to the risks of war. Below this apparent overall criteria, however, the extent to which degrees of danger can be reliably differentiated in the context of modern warfare is questionable. As a result, women are excluded from some "fighting"

jobs, but not others, and may be "protected" in some jobs but are at substantial risk in others.

Air Force

Air Force officials told us that women can successfully serve on combat aircraft. For example, there is a woman F-16 pilot in the Netherlands Air Force. Further, both the Danes and Canadians are experimenting with women serving in combat positions. However, American women are barred from such assignments. Since the prohibition is not based on an inability to do the job, the basis for maintaining the restriction appears to be that fighting is not a proper role for women or that they should be protected from the dangers of flying combat aircraft, or both.

Air Force women, however, do perform fighting roles as missile crew members. As of November 1987, there were 13 women on the firing crews of the Ground Launched Cruise Missile (GLCM) and women also serve in GLCM maintenance and support functions. Because the GLCM is currently deployed throughout Europe they are primary targets in a conflict. Additionally, 74 women serve on Minuteman missile firing crews.

The Air Force has stated that there really are not going to be any safe places in a theater of conflict. For example, in 1984, the Assistant Secretary of the Air Force for Manpower and Reserve Affairs told the House Armed Services Committee that it is not only the people sitting in the cockpits who are going to be fighting in war. He said that air bases are going to be vulnerable, and they will be attacked, and people are going to have to carry rifles and defend the air bases. Women are stationed at U.S. air bases throughout Europe.

Army women also serve on missile crews, including the Pershing missile, and the Hawk and Patriot air defense missiles. All of these can be found deployed in West Germany and hence will be targets in any European conflict.

Navy/Coast Guard

Navy women are excluded from serving on Combat Logistics Force ships because the Navy includes these ships as part of the combatant group. The CLF ships do not individually have a combat mission under the Navy's definition. They provide support services to the other ships in the combatant group. However, the Navy ascribes the combat mission of a task group to all the ships that travel as part of that group.

The reason for such an exclusion would appear to be protection since the ship does not have an offensive fighting role. Navy and civilian women, however, can serve on Military Sealift Command (MSC) ships which perform the same function as CLF ships, but they do not travel continuously with the combatant group. However, in a conflict, MSC ships will be targets and will be required to defend themselves.

Coast Guard women can serve on any Coast Guard ship, some of which are expected to have combat missions in wartime. The Coast Guard believes that its women crew members are an integral part of the crew and that their removal would be detrimental to ship operations. Therefore, in wartime, unless the Secretary of the Navy decides differently, Coast Guard women may perform in jobs from which Navy women are excluded.

Army

The Army's coding system will normally exclude women from positions located forward of the brigade's rear boundary whether or not the positions are fighting positions. The impact is to preclude women from front line fighting roles and to provide some degree of protection. However, in our opinion, the extent to which women can be protected is questionable. Women are now stationed forward of the brigade's rear boundary on a continuing basis as members of forward support battalions which provide combat service support. And they may travel as close to the battlefront as they need to, on a temporary basis, to do their job. As we have mentioned already, women are also in fighting positions as members of missile crews. Further, Army officials told us that it is reviewing positions in the Lance missile firing batteries to determine if they can be opened to women. Those batteries, which are currently closed to women, are located behind the brigade's rear boundary, and they only traverse that boundary to fire their weapons close to the battle front.

Marine Corps

Marine Corps policy acknowledges that women may be assigned to support units in designated hostile fire areas where they could become involved in defensive combat action resulting from an enemy attack. Thus, women are exposed to a strong possibility of capture.

Impact of Combat Exclusion Laws/ Policies

As you know, our work focused on the policy level and was not designed to identify the specific impact of the application of the combat exclusion policy. However, as has been stated by the Chairwoman of the Defense Advisory Committee on Women in the Services, a major impact has been to inhibit the career progression of women in the military by excluding them from some jobs they are capable of filling.

There are also some overall impacts on Defense's force management. First, there is some concern that the declining pool of 18-26-year-old males in the 1990s will make recruiting difficult. Restrictions on the jobs that women may hold may exacerbate any recruiting problems that may arise because of the population decline. The restrictions close off an excellent source of high quality recruits.

Second, restrictions impede the most effective management and assignment of personnel. Women may be unnecessarily excluded from high technology, support, and aircraft crew jobs, no matter how capable they are of doing those jobs.

Lastly, impediments to the most effective management of personnel assignments can negatively effect the morale and retention of both men and women. For example, if women cannot go to sea, then men must serve longer tours of sea duty.

There are, however, several valid concerns expressed by the services as the role of women in the military has increased. DOD and the services have maintained that a policy which opens combat positions to women is a social question which DOD is poorly equipped to address, rather than a question of military operations. Other concerns include the higher attrition rates of women, pregnancy, and the potential problems caused by an increase in single parents in the services.

Madam Chairwoman, I have presented here today a discussion on how applying the combat exclusion provisions affect the kinds of jobs open to women in the military services. While the impact on jobs open to women tends to raise questions about the services' practices, we believe the services are making a concerted effort to apply the statutes accurately in the changed warfare environment facing them today. The differing applications of the statutes do raise questions. Yet, there is no easy solution. The services are different, and establishing hard and fast criteria in today's military and social environment is not easy. But the

effects of the current situation are clear—military women are being impeded from progressing in their chosen fields.

That concludes my prepared statement. We will be happy to respond to questions.

Comments From the Assistant Secretary of Defense for Force Management and Personnel

ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301-4000

FORCE MANAGEMENT AND PERSONNEL

15 AUG 1988

Mr. Frank C. Conahan
Assistant Comptroller General
National Security and International
Affairs Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Conahan:

This is the Department of Defense response to the General Accounting Office draft report, "MILITARY WOMEN: More Jobs Can Be Opened Under Current Statutes" (GAO Code 391082/OSD Case 7688).

The report accurately describes steps the Department has taken to expand opportunities for women since the draft was terminated in 1973, and briefly outlines recent DoD actions to standardize, to the extent practicable, Service interpretations of combat exclusion statutes. It is the position of the Secretary of Defense that the combat exclusion statutes under 10 U.S.C. and derivative Service policies (e.g., to assure sea/shore rotation opportunities) are the only restrictions to women in equitably competing with men for assignment to all positions in the military. Additionally, within the past 6 months, the Department has reviewed its policies regarding combat exclusion and has issued guidance to the Secretaries of the Military Departments to ensure that there is no misinterpretation of the combat exclusion laws.

Recent Department decisions to open additional positions to women have necessitated many changes now being initiated in the Services' administrative, operational, training and logistical functions. Examples of these include developing a comprehensive plan to attract more women toward nontraditional occupational fields; changing assignment policies to allow more women into previously excluded positions and units, key billet and command positions, and career schools; changing training policies and procedures to allow women to qualify for newly opened positions; and altering ship berthing arrangements to accommodate women. Many of these issues were addressed by the GAO.

The Department of Defense concurs with most of the findings in the draft report, but does not concur with all of the GAO recommendations. Specifically, the Department agrees that Marine Corps noncombat skills now subject to equal accession goals for men and women should be opened

on a gender-neutral basis, unless an analysis of program needs indicates a requirement for gender-specific goals. The Department also concurs that the Navy should consider berthing area configurations when establishing male/female distribution of noncombat sea duty positions, and the Navy is already taking action on this issue.

The Department partially concurs with the GAO concern about the restriction of 8.4 percent for female pilot training seats. Additional justification of this restriction needs to be made in light of our broad goal to maximize opportunities for women. However, it would be premature to change this entry policy until additional research is conducted.

Finally, the Department does not agree with the GAO recommendation that the Army should remove limits resulting from the implementation of accession goals for women. These goals constitute minimum goals, rather than limits, for female accessions, goals the Army must exert itself to achieve. Should the goals be removed, a significant decline in female accessions would result.

Detailed Department of Defense comments on all of the GAO findings and recommendations are provided in the enclosure. (Some suggested technical changes were also separately provided to the GAO Staff.) The Department appreciates the opportunity to comment on this draft report.

Sincerely,

David J. Armor
Principal Deputy

Enclosure:
As stated

GAO FINAL REPORT - DATED JUNE 15, 1988
(GAO CODE 391082) OSD CASE 7688

"MILITARY WOMEN: MORE MILITARY JOBS CAN BE OPENED UNDER CURRENT STATUTES"

SUMMARY OF FINDINGS TO BE ADDRESSED IN THE DOD RESPONSE TO THE GAO DRAFT REPORT

*****

FINDINGS

FINDING A: Statutes Limit Opportunities For Women. The GAO observed that, since the inception of the All-Volunteer Force in 1973, the number of women in the U.S. Military Services has increased from 2.5 percent of total forces in FY 1973, to 10.2 percent in FY 1987. The GAO concluded, however, that although the number of women in the Services has grown dramatically, statutes and Service policies restrict the kinds and numbers of military jobs available to women. The GAO cited sections 6015 and 8549 of 10 USC, which prohibit the assignment of Air Force, Navy and Marine Corps women to aircraft engaged in combat missions and prohibit Navy and Marine Corps women from serving on Naval vessels engaged in combat missions. The GAO further found that the Army, although not covered by statutory restrictions, by policy excludes women from positions likely to be involved in combat. The GAO observed that there is also an indirect impact from the combat exclusion provisions, which stems from Service efforts to address the resulting resource management and equity problems affecting men and women in terms of assignment type, location and career progression opportunities. The GAO found that, to meet these program needs created by combat restriction provisions, the Services close some noncombat jobs to women and, in addition, jobs available to women are further limited by some Service procedures for identifying and implementing accession goals for women. (pp. 7-8/GAO Draft Report)

Now on p. 8.

DoD RESPONSE: Concur.

Since the inception of the All-Volunteer Force, however, the Department has taken and continues to take the necessary measures to ensure that women have full opportunity for rewarding careers in the military services. The Secretary of Defense stated in July 1983: "It is the policy of this Department that women will be provided full and equal opportunity with men to pursue appropriate careers in the military services for which they can qualify. This means that military women can and should be utilized in all roles except those prohibited by combat exclusion statutes and related policy. This does not mean that the combat exclusion policy can be used to justify closing career

opportunities to women. The combat exclusion rule should be interpreted to allow as many as possible career opportunities for women to be kept open.

.....civilian and military leadership of this Department must ensure that military personnel policies afford individuals the opportunity to contribute and advance commensurate with their aspirations and qualifications. While recruiting, training, assignment, promotion, and retention of individuals, of course, must be predicated on Service needs and individual capabilities, no artificial barriers to career opportunity for women will be constructed or tolerated."

The DoD Task Force Report on Women in the Military (January 1988) included an in-depth study pertaining to the combat exclusion statutes and the effect that the various interpretations and applications of those statutes had on limiting career opportunities for women. The statutes, established in 1948, provide only minimum criteria for excluding women from military positions; namely, ships and aircraft with combat missions. Nothing in the law prohibited the Services from applying combat exclusion policies to units other than ships or aircraft, and all Services have done so.

More important, the law does not define "combat mission." The task has been left to the Department of Defense and, in fact, to each Military Service. Given the differences in mission, organization, and operational practice, the Services have developed somewhat different definitions of combat mission, and these definitions have changed over time in response to changes in military doctrine, technology, and utilization of forces.

Not all differences in combat exclusion policies, however, arise from Service differences in combat forces. The differences of greatest concern to the Task Force arose from specific interpretations of the law (in all Services) concerning placing women at risk of exposure to hostile fire or capture. While the statutes do not mention such risks, their legislative histories can support the view that Congress intended the combat exclusion laws to protect women from the most serious risks of harm and capture.

In order to maintain a proper nexus to combat, the Secretary's guidance to the Secretaries of the Military Departments stated that risks of direct combat, exposure to hostile fire, or capture are proper criteria for closing noncombat positions or units to women, providing that the type, degree, and duration of such risks are equal to or greater than the combat units with which they are normally associated within a given theater of operations. If the risk of noncombat units or positions is less than comparable to land, air, or sea combat units with which they are associated, then they should be open to women.

Given this rule for determining the extent of risk, the Secretary of Defense has tasked the Secretaries of the Military Departments to review specified areas identified in the DoD Task Force Report for the possible inclusion of women. The Military Department reviews will be completed and briefed to the Secretary of Defense by September 1, 1988.

Finding B: Opportunities For Women In The Services Have Expanded. The GAO found that, through revisions based on periodic policy review, the Services have expanded some available assignment and career fields for women, while still maintaining application of the statutory restrictions. The GAO reported that, in the fall of 1987, the Office of the Secretary of Defense, the Navy and the Marine Corps, in response to a report from the Chairman of the Defense Advisory Committee on Women in the Services, once again reviewed their policies on the assignment of women. The GAO observed that these reviews resulted in:

- standardization of the criteria used to determine when exposure to risk justifies closing noncombat jobs to women; and

- opening to women 26 of the Navy's combat logistics force ships, reconnaissance missions of the EP-3 Aircraft, and some Marine Corps embassy security guard assignments.

Now on p. 9

The GAO concluded that, despite the restrictions, some opportunities for women have expanded. (pp. 8-9/GAO Draft Report)

DoD RESPONSE: Concur.

The recent Secretary of Defense decisions on the recommendations from the DoD Task Force on Women in the Military opened a significant number of positions to women from which they were previously excluded. Additionally, in response to the Secretary of Defense guidance for opening more noncombat billets to women, the Military Departments have completed their reviews of noncombat support units and positions currently closed to women. They will report their findings and initiatives to the Secretary of Defense before September 1, 1988.

FINDING C: Direct Impact Of Combat Exclusion Provision. The GAO reiterated that, by law, the Air Force, Navy and Marine Corps cannot assign women to an aircraft with combat missions; and the Navy and Marine Corps cannot assign women to Naval vessels having combat missions. The GAO observed that the Air Force also restricts additional positions because it interprets the intent of the combat exclusion statute to also protect women from capture. The GAO explained that the Marine Corps identifies its direct combat requirements as enough positions to form two Marine Expeditionary Brigades from each of the three Marine Expeditionary Forces. The GAO further explained that, on the other hand, by policy (based on its understanding of the intent of the statutory exclusion), the Army does not assign

women to positions identified as the most likely to be engaged in combat activity. The GAO calculated that, as a result of the statute and policy restrictions, about 1.1 million of the 2.2 million military jobs are closed to women. (pp. 13-14/GAO Draft Report)

Now on pp. 11-12.

DoD RESPONSE: Concur.

FINDING D: Impact Of Closure To Meet Program Needs: Air Force. The GAO found that the Air Force closes some noncombat positions to provide assignment rotation opportunities for men assigned to overseas billets affected by the combat exclusion statute. The GAO pointed out, however, that the number of positions in this category was initially determined by a 1985 study and, although the number of noncombat jobs needed to provide rotation has changed since then, the Air Force has continued the same ratio of combat to noncombat positions. The GAO concluded that, in FY 1988, the Air Force reserved 504 officer and 1,452 enlisted positions to meet rotation needs. (The GAO noted that rotation is the only program need the Air Force considers a constraint on female accession.) (p. 14/GAO Draft Report)

Now on p. 12.

DoD RESPONSE: Concur.

FINDING E: Impact Of Closure To Meet Program Needs: Army. The GAO observed that the Army closes some stateside noncombat officer jobs to women in order to meet program needs created by the combat restriction policy to provide (1) rotational assignments and (2) combat casualty replacements that would be needed in the early days of a conflict. According to the GAO, the Army also reviews career progression paths to ensure the same percentage of total jobs (combat and noncombat) is reserved at each higher grade to provide promotion opportunities. The GAO concluded that, in FY 1987, these program considerations led the Army to set aside 5,371 noncombat officer positions for men. (p. 15/GAO Draft Report)

Now on pp. 12-13.

DoD RESPONSE: Concur.

FINDING F: Army Policy Which Excludes Women From Combat Also Closes Noncombat Jobs To Women In The Enlisted Ranks. The GAO found that the Army considers four program needs in restricting noncombat enlisted jobs:

- sufficient men in the lower grades to meet combat requirements;

- sufficient stateside jobs to provide rotational assignments for men in overseas restricted positions;

- availability of noncombat jobs to provide career enhancing experience for men in combat jobs; and

- prevention of promotion bottlenecking for women by restricting the maximum percentage of women in each job category within a career field to the percentage of women allowed in the job category with the lowest percentage of women.

The GAO explained that the Army closes enough enlisted positions to accommodate the program need affecting the greatest number of jobs at each grade in each job category. The GAO further explained that, in addition, the Army also adjusts the maximum number of jobs available to women at a specific grade level, within a job category, to reflect the ratio of women to total requirements within that category--in order to ensure equitable promotion opportunities for both men and women, as may be necessary. The GAO concluded that, in FY 1987, these four considerations led the Army to set aside 72,779 enlisted noncombat positions for men and the related ratio adjustment to ensure equitable promotion opportunities closed an additional 20,171 noncombat positions to women. (pp. 15-17/GAO Draft Report)

Now on pp. 13-14

DoD RESPONSE: Concur.

FINDING G: Impact Of Closures To Meet Program Needs: Navy Officers. The GAO found that the Navy does not identify total combat and noncombat male-only requirements at officer grades. Instead, the Navy determines jobs available for women officers through its processes for setting accession goals, where the Navy identifies the number of sea duty positions on noncombat ships, and allots a portion of them to women based on the categorization of the job. The GAO reported that, as a result, the data on the impact of related program needs is not available. (pp. 17-19/GAO Draft Report)

Now on p. 14

DoD RESPONSE: Partially concur.

The DoD does not concur with the implication that the setting of female officer accession goals is solely driven by identification of sea duty positions on noncombatant ships.

For each officer community, the Navy uses a complex set of career development factors, such as skill requirements, rotation and promotion factors, and available talent pool, in assigning accession goals or quotas. Accession quotas are established for those officer communities which require sea duty experience on board ships or squadrons, to ensure that women officers are able to pursue a career path similar to men in the same community. The aviation officer community currently has a study in progress to determine ways to increase the number of female officers based on the newly authorized aviation officer career patterns. Accession goals for the other officer communities are developed to provide the optimum number of women that will be gained in a specific officer community during the year.

All goals and quotas are designed to provide women officers with meaningful, viable and professional career opportunities and to preclude career path stagnation. The Navy conducts annual reviews, for each officer community, of its procedures for determining women officer accession goals and quotas. As data and trends are developed, necessary changes to accession goals and quotas are developed and instituted.

FINDING E: Impact Of Closures To Meet Program Needs: Navy Enlisted. The GAO reported that, in order to determine job availability and accession goals for enlisted women, the Navy identifies the number of sea duty positions on noncombat ships and allots a portion to women, based upon the categorization of the job. The GAO further reported that allotment percentages are set to (1) provide sufficient openings to accommodate the Secretary of Defense mandated end strength goals for Navy women of 9.6 percent for FY 1991, and (2) account for the current distribution of women among sea intensive and shore intensive jobs. According to the GAO, based on these considerations, the Navy allots 50 percent of sea duty enlisted jobs to women, except for jobs requiring administrative/communication skills, where the percentage is 70, and boiler technician, machinist mate and fireman jobs, where the percentage is 40. The GAO found that, in addition, 50 percent of the overseas shore assignments credited as sea duty are allocated to women. According to the GAO, the 50/50 distribution is intended to achieve gender equality. The GAO concluded that, under this methodology, the Navy projects 235,892 noncombat enlisted positions will be closed to women in FY 1991.
(pp. 18-19/GAO Draft Report)

Now on pp. 14-15

DoD RESPONSE: Concur.

FINDING I: The Navy Methodology For Allocating Enlisted Positions To Women Does Not Take Into Consideration Berthing Area Configurations Of Ships. The GAO found the gender composition of crews on noncombat ships is constrained by the male/female combinations that can be accommodated by the sizes of the ships' berthing areas. The GAO observed that, while the Navy intends to increase the number of women at sea, because it does not correlate positions targeted for women with the size of ships' berthing areas, there is no certainty that the ships will be able to accommodate the designated number of women and, as a result, the Navy may not be able to assign women to all sea duty positions theoretically open to them. The GAO concluded that the Navy needs to consider the configuration of berthing areas when determining sea duty availability for women rather than determining availability solely on the basis of whatever combinations of job category inventories is needed to meet mandated inventory goals. The GAO further concluded that, unless this is done, the size of the berthing area will

Now on pp. 15-16

act as a constraint on the assignment of women once they have entered the Service. (pp. 19-21/GAO Draft Report)

DoD RESPONSE: Concur.

A Navy review of the total noncombat shipboard billets available to women was completed in March 1988. The plan for shipboard alterations will provide for segregated open-bay berthing areas for men and women. It is necessary to make incremental changes to ensure that each noncombatant ship will be able to receive women in increments equivalent to berthing space capacities varying from 12 to over 60 accommodations per space. Based on this, the following actions have been taken:

- The available noncombat shipboard billets will be allotted equitably (50 percent each) between men and women.

- The Naval Sea Systems Command (NAVSEA) was tasked on March 30, 1988, to plan ship alterations to configure ships available for the assignment of women to berth one-half of the Enlisted Basic Allowance on each ship to women. Specific number of berths that must be made available has been provided to the NAVSEA for planning.

- The preliminary NAVSEA ship alteration plan, completed on June 16, 1988, is currently under review.

The Navy objective, within the constraints of shipboard habitability and environment, is to make sufficient shipboard billets available to women to achieve the goals outlined in Finding H.

FINDING J: The Marine Corps Limits The Number Of Positions Women May Hold Beyond The Restrictions Required By The Combat Exclusion Provisions And Related Program Needs. The GAO found that the Marine Corps apportions positions in some job categories equally between men and women without any justification directly related to combat exclusion or programs needs. The GAO observed that, in FY 1988, Marine Corps procedures led to 28,432 noncombat enlisted positions being closed to women. The GAO also noted that, once the number of enlisted positions open to women is determined, adjustments are made to provide career progression opportunities for both men and women. According to the GAO, the adjustments limit the number of women in any job category to the second lowest proportion of women in all grade levels within that category. The GAO found that, in FY 1988, these limits closed an additional 3,130 enlisted positions to women. The GAO concluded that the Marine Corps methodology limits the filling of some positions with women to their proportion in the general population, when the positions should be open without limitation. The GAO further concluded that this distribution is not required by the combat exclusion laws or any related program needs and, unless the Marine Corps can show a program

Now on pp. 16-17

need for this distribution, these jobs should be available on a gender-neutral, open-access basis. (pp. 21-23/GAO Draft Report)

DoD RESPONSE: Concur.

Based on existing legislation, guidance from the Secretary of Defense February 2, 1988, memorandum and the Secretary of the Navy definition of "combat mission," the Marine Corps developed its combat exclusion policy. This policy ensures that women are not classified into combat occupational fields, or Military Occupational Specialties (MOSs). Further, regardless of their individual MOSs, it precludes women from assignment to units whose normal mission requires the unit to seek out, reconnoiter or engage the enemy in offensive combat action, or units whose employment subjects women to essentially the same risk (in terms of degree and duration) as combat units employed in the same area.

An examination of the Marine Corps 473 enlisted MOSs reveals that the combat exclusion and related policies forms the basis for the restrictions in all but four specialties. In these four, which have no combat requirements, the Marine Corps uses the "50/50" rule to allocate accessions equally between men and women. The four skills encompass a total of 376 potential billets. Of these, 188 are currently allocated and recruited to be filled by women. The Marine Corps advises that one specialty in the Marine Corps Exchange field is being eliminated for both men and women and a second converts to a combat photographer specialty at the E-5 pay grade, which entails some combat restrictions for women once attaining that grade. The intent of the Marine Corps in implementing the "50/50" rule has been to ensure equitable career opportunities for both men and women in these specialties. However, the Department agrees with the GAO that the Marine Corps should demonstrate a program need for the "50/50" rule or otherwise make the positions available on a gender-neutral, open-access basis.

Now on pp. 20-22

FINDING K: Air Force Flying Officer Training Quotas Restrict The Number Of Jobs Made Available To Women. The GAO reported that the Air Force restricts entry to only two officer career fields because of combat exclusion provisions--pilot and navigator. The GAO found, however, that the Air Force makes available to women only a small percentage of unrestricted noncombat pilot and navigator openings based on its estimate of the proportion of women among those in the general population who are interested in joining the Air Force and qualified to become Air Force pilots and navigators. The GAO observed that, as a result of this policy, of 480 unrestricted pilot positions only 40 may be filled by women (8.4 percent). The GAO concluded that this policy is unnecessarily restrictive. (pp. 26-28/GAO Draft Report)

DoD RESPONSE: Partially concur.

Additional research is required to ensure that expansion of flying training opportunities for women would permit the Air Force to meet requirements for qualified aircrews at an affordable cost.

The current Air Force methodology provides opportunity for those flying careers open to both men and women in proportion to the interested and qualified population of the entry cohort. Every Air Force Academy cadet who is qualified and volunteers for flight training is assured a quota. The Reserve Officer Training Corps and Officer Training School graduates, both men and women, compete for the remaining positions.

Before any decision can be made on a gender-neutral flying training entry policy, additional issues require further study. First, the undergraduate pilot training attrition rate (FY 1981 through FY 1987, inclusive) for women is 34 percent, compared to 26 percent for men. This means that relatively fewer women complete training, given equal numbers of entrants. In view of current and projected pilot shortfalls and the very high cost of training pilots, the relative cost-effectiveness of expanding women entrants will be dependant upon the development of a flight training selection methodology that can predict successful pilot training completion equally well for men and women. Second, the current 6-11 year voluntary continuation rates for women pilots and navigators are at least 20 percent lower than those for their male counterparts flying similar aircraft. This experience indicates a probability that expansion of the number of women flyers in the initial term of service would detract from longer term efforts to reverse the projected critical pilot shortage.

In view of these considerations, implementation of a gender-neutral pilot training program would be premature without further analysis.

FINDING L: Air Force Has Controlled The Number and Kinds Of Jobs Made Available To Women Applicants. The GAO found that the number of jobs made available to women enlisted personnel is, again, based on the Air Force estimate of the ratio of women among those persons in the general population qualified and interested in those Air Force jobs. The GAO observed that, as a result of this policy, in FY 1987, the overall percentage estimate of the ratio of women among the qualified and interested jobs ranges from 15 to 19 percent of the total pool of qualified and interested personnel; in FY 1988, it increased from 18 to 22 percent. The GAO observed that the Air Force enlisted personnel system stemmed from procedures in place prior to 1986, which set a maximum for enlisted female accessions. The GAO noted that, according to Air Force officials, implementation of a single, gender-free job listing would take a maximum of 18 months (or a total of 6,000 programming hours) to implement and would be costly and time-consuming to

revise if quotas were imposed. The GAO noted, however, that following its February 1988 briefing to the House Armed Services Committee, the Committee removed the minimum enlisted accession quotas and, in the National Defense Authorization Bill for FY 1989, directed the Air Force to develop and implement a gender-neutral system for enlisted accessions, to be implemented within 18 months after the bill is signed into law. (pp. 27-29/GAO Draft Report)

Now on pp. 22-23

DoD RESPONSE: Concur.

FINDING M: Army Enlisted Accession Policy Limits The Number Of Women Recruited And The Job Opportunities For Women. The GAO found that (1) the Army Recruiting Command sets gender-specific accession goals, (2) gender substitutions are not permitted, and (3) separate male and female job listings are used in recruiting. The GAO noted that the number of jobs open to women is far below the 231,000 unrestricted Army jobs. The GAO concluded that the number of unrestricted jobs and the available supply of interested and qualified women should govern the number of Army enlisted women, instead of separate annual accession goals for women. (pp. 30-34/GAO Draft Report)

Now on pp. 23-24

DoD RESPONSE: Partially concur.

The DoD agrees with the GAO description of the Army accession procedures, but does not agree with the conclusion that the number of unrestricted jobs and the available supply of interested and qualified women should govern the number of Army enlisted women.

The GAO conclusion implies that there is a large number of females who desire to enter the Army, but cannot because of the implemented accession goals. Qualified females are not being denied enlistment in the Army. Current Youth Attitude Tracking surveys have shown that females are only one third as likely to want to join the Army as males, and that only about 8 percent of the eligible female population expressed any interest toward joining the Army. Therefore, of the 231,000 interchangeable positions cited by the GAO, approximately 76,000 could be expected to be filled by females. Currently, 71,059 are filled by females. The Army is programmed to increase female end strength annually to approximately 74,000 by FY 1994.

If the female accession floor was removed and the recruiting force allowed to recruit on a gender-neutral basis, a significant reduction in female accessions would occur. Accession goals for women are not ceilings; rather they represent the minimum number of females required to meet end strength objectives. While accession goals do limit, to some degree, the number of both males and females allowed to access onto active duty in a given fiscal year, they do not limit the opportunity for either men or women to enlist into the Delayed Entry Program.

FINDING H: The Navy Determines Job Availability For Women Officers Through Unique Procedures For Setting Accession Goals For Each Career Field. The GAO found that each of ten Navy career field managers applied similar concepts, but unique processes in setting proposed accession goals. The GAO noted that the impact of these various processes on job opportunities for women was unclear. The GAO further noted that a 1987 Navy special study group on women has brought about some changes in job opportunities for women, but the effect remains to be seen. The GAO did find unnecessary limits placed on jobs for women in three career fields, prior to completion of the 1987 special Task Force report. In the pilot area field, the GAO found that where accession goals for women had been arbitrarily limited to one-half of the unrestricted combat openings, changes in opportunities for women recommended by the Task Force were not incorporated in the formulation of annual accession goals. The GAO concluded that, despite the opening of the EP-3 aircraft to women as a result of the Task Force study, the Navy has not increased the number of unrestricted noncombat positions available to women. The GAO also observed that, while increased job availability was incorporated into the formulation of accession goals in the other two career fields (surface warfare and special operations), the extent to which the changes removed unnecessary limitations on female accessions could not be determined. The GAO concluded that the Navy should review all of its approaches for determining job availability for women officers to ensure that unnecessary limitations do not exist and that changes in job availability are incorporated into determination of accession goals. (pp. 31-36/GAO Draft Report)

Now on pp. 24-25

DoD Response: Concur.

The DoD concurs with the GAO statements regarding job opportunities for female naval officers prior to 1987 and appreciates acknowledgement of the Navy efforts to increase women officer career opportunities subsequent to 1987. The Navy routinely conducts thorough reviews of opportunities for women in all career fields. These reviews consider feasible policy changes to eliminate restrictions on the number and type of positions which are available to women. The Navy has a study of all naval pilot programs in progress, which will determine the correct number of women officers that can be supported by the newly authorized aviation career patterns. The Navy intends to increase the number of women pilots above the level referenced in the GAO report as soon as the study is complete.

RECOMMENDATIONS

RECOMMENDATION 1: The GAO recommended that the Secretary of the Navy direct the Marine Corps to provide open access on a gender-neutral basis to noncombat assignments now equally divided between men and women to reflect the gender composition of the general population. (p. 25/GAO Draft Report)

Now on p. 18.

DoD RESPONSE: Concur. The DoD agreement is subject to an analysis of program need, which the Marine Corps has been tasked to submit to the Office of the Secretary of Defense for review by August 31, 1988. (If the Marine Corps can demonstrate such a need, open access could be inappropriate.)

RECOMMENDATION 2: The GAO recommended that the Secretary of the Navy consider berthing area configurations when establishing the male/female distribution of noncombat sea duty positions. (p. 25/GAO Draft Report)

Now on p. 18.

DoD RESPONSE: Concur. The Navy has completed a review of the billets necessary to achieve FY 1991 goals for sea duty billets for women. Preliminary plans for ships alterations, to accommodate the required number of women at sea in FY 1991, have been completed. Overall action is expected to make 50 percent of noncombat shipboard billets available to women.

RECOMMENDATION 3: The GAO recommended that the Secretary of the Air Force allow all unrestricted pilot and navigator openings be available for competition based on individual qualifications without regard to gender. (p. 36/GAO Draft Report)

Now on p. 27.

DoD RESPONSE: Partially Concur. Implementation of a gender-neutral pilot training entry program would be premature until additional research on attrition and continuation rates can demonstrate that expansion of flying training opportunities for women would permit the Department to meet qualified aircrew requirements at an affordable cost. The DoD does agree, however, the situation needs additional evaluation. The Air Force has been tasked to provide an analysis of this matter to the Office of the Secretary of Defense by October 31, 1988, for review.

Now on p. 27.

RECOMMENDATION 4: The GAO recommended that the Secretary of the Army remove limits resulting from the implementation of accession goals for women enlistees. (p. 36/GAO Draft Report)

DoD RESPONSE: Nonconcur. The objectives established by the Army are not limits that restrict women entrants, but goals that the Army must exert itself to achieve. Such goals are essential accession flow management tools to ensure the Army remains within budgeted resource and manpower constraints, and scheduled training base capacity.

Now on p. 27.

RECOMMENDATION 5: The GAO recommended that the Secretary of the Navy review procedures for determining female accession goals for women officers to eliminate unnecessary restrictions on job availability which may result from those procedures. (p. 36/GAO Draft Report)

DoD RESPONSE: Concur. The GAO implies, however, that the Navy should execute a task that is already incorporated in the planning and execution of its accession program. The Navy has and will continue to conduct rigorous annual reviews of the procedures for determining accession goals for women officers to ensure increasing participation in all aspects of the Navy. These reviews also consider feasible policy changes to eliminate restrictions on the number and type of positions which are available for women officers in each community as changes in technology and society change the interpretation of law, regulations and customs. The Navy does and will continue to ensure that any necessary restrictions on job availabilities are identified, and that compelling reasons do exist for considering these restrictions in the determination of female accession goals. Annual reviews of the officer communities and their accession plans are conducted throughout the calendar year.

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